

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

---

IN RE:

JENSEN, ERIC

Debtor

---

)  
)  
)  
)  
)  
)  
)  
)  
)  
)

Case No. 23-10201-BFK  
Chapter 7

**TRUSTEE’S MOTION FOR ENTRY OF CONSENT ORDER RESOLVING  
CLAIM NO. 3 FILED ON BEHALF OF WPI-MADISON LLC AND  
CLAIM NO. 4 FILED ON BEHALF OF 209 MADISON OWNER LLC**

Janet M. Meiburger, the Trustee in the above-named case, by her undersigned counsel, hereby requests that the Court enter the Consent Order Resolving Claim No. 3 filed on Behalf of WPI-Madison LLC and Claim No. 4 filed on Behalf of 209 Madison Owner LLC (the “Consent Order”), a copy of which is attached hereto as Exhibit A. The Consent Order reflects the agreement of the parties regarding the treatment of Claim No. 3 and Claim No. 4. This treatment is consistent with the Trustee’s analysis of the correct treatment of the claims and does not represent a compromise between the parties regarding the treatment of the claims. The Consent Order is also being submitted to the Court through the BOPS system.

WHEREFORE, Janet M. Meiburger, the Chapter 7 Trustee, respectfully requests that the Court enter the attached Consent Order Resolving Claim No. 3 filed on Behalf of WPI-Madison LLC and Claim No. 4 filed on Behalf of 209 Madison Owner LLC.

Respectfully submitted,

THE MEIBURGER LAW FIRM, P.C.

---

Janet M. Meiburger, VA Bar No. 31842  
The Meiburger Law Firm, P.C.  
1487 Chain Bridge Road, Suite 201  
McLean, VA 22101  
(703) 556-7871  
Counsel for Chapter 7 Trustee

Dated: April 25, 2025

By: /s/ Janet M. Meiburger  
Janet M. Meiburger, VSB No. 31842  
The Meiburger Law Firm, P.C.  
1487 Chain Bridge Road, Suite 200  
McLean, VA 22101  
(703) 556-7871  
Counsel for Chapter 7 Trustee

**CERTIFICATE OF SERVICE**

I HEREBY certify that on this 25<sup>th</sup> day of April, 2025, a true and correct copy of the foregoing Trustee's Motion for Entry of Consent Order Resolving Claim No. 3 filed on Behalf of WPI-Madison LLC and Claim No. 4 filed on Behalf of 209 Madison Owner LLC will be served by ECF e-mail pursuant to the applicable Standing Order of the Court.

/s/ Janet M. Meiburger

Janet M. Meiburger

# EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

\_\_\_\_\_  
IN RE: )  
)  
)

JENSEN, ERIC )  
)

Debtor )  
\_\_\_\_\_) )

Case No. 23-10201-BFK  
Chapter 7

**CONSENT ORDER RESOLVING  
CLAIM NO. 3 FILED ON BEHALF OF WPI-MADISON LLC AND  
CLAIM NO. 4 FILED ON BEHALF OF 209 MADISON OWNER LLC**

Upon consideration of the Trustee's Motion for Entry of Consent Order Resolving Claim No. 3 filed on Behalf of WPI-Madison LLC and Claim No. 4 filed on Behalf of 209 Madison Owner LLC (Docket No. \_\_\_\_), and with the consent of the parties, as indicated by the signatures of their counsel below, it is hereby

ORDERED that Claim No. 3 filed on behalf of WPI-Madison LLC is disallowed as duplicative with Claim No. 4; and it is further

ORDERED that Claim No. 4 filed on behalf of 209 Madison Owner LLC is allowed as a general unsecured claim in the amount of \$542,267.53, consisting of rent owed through October, 2022, plus \$25,000.00 in attorneys' fees.

Date: \_\_\_\_\_

\_\_\_\_\_  
U.S. Bankruptcy Judge

\_\_\_\_\_  
Janet M. Meiburger, VA Bar No. 31842  
The Meiburger Law Firm, P.C.  
1487 Chain Bridge Road, Suite 200  
McLean, VA 22101  
(703) 556-7871  
Counsel for the Chapter 7 Trustee

Entered on Docket: \_\_\_\_\_

I ASK FOR THIS:

/s/ Janet M. Meiburger  
Janet M. Meiburger, Esq. (VSB No. 31842)  
The Meiburger Law Firm, P.C.  
1487 Chain Bridge Road, Suite 200  
McLean, Virginia 22101  
Phone: (703) 556-7871  
*Counsel for the Chapter 7 Trustee*

SEEN AND AGREED:

/s/ Christopher B. Bowman  
Christopher B. Bowman, Esq. (VSB No. 67977)  
Miles & Stockbridge P.C.  
1751 Pinnacle Dr., Suite 1500  
Tysons Corner, VA 22102  
Phone: (703) 610-8620  
*Counsel for 209 Madison Owner LLC and WPI-Madison LLC*

Local Rule 9022-1(C) Certification

I hereby certify that the foregoing [proposed] Consent Order Resolving Claim No. 3 filed on Behalf of WPI–Madison LLC and Claim No. 4 filed on Behalf of 209 Madison Owner LLC and has been endorsed by all necessary parties.

/s/ Janet M. Meiburger  
Janet M. Meiburger

**PARTIES TO RECEIVE COPIES BY MAIL:**

NONE

J:\Trustee\Jensen, Eric (23-10201)\Pleadings\Claim Nos. 3 and 4.Consent Motion.1.Order.1.docx